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**STATE OF CALIFORNIA**  
**BUSINESS, TRANSPORTATION AND HOUSING AGENCY**  
**DEPARTMENT OF CORPORATIONS**

TO: David Crosby  
Richard Trefflich  
First Legacy Financial Group, Inc.  
First Legacy Financial, Inc.  
4565 Ruffner Street, Suite 101  
San Diego, CA 92111  
and  
3609 W. MacArthur Blvd. #810  
Santa Ana, CA 92704  
and  
www.flfinc.com

**DESIST AND REFRAIN ORDER**  
**(For violations of section 25110 of the Corporations Code)**

The California Corporations Commissioner finds that:

1. First Legacy Financial Group, Inc. (“First Legacy Financial Group”) was incorporated under the laws of California on August 18, 2008. Its principal place of business is 4565 Ruffner Street, Suite 101, San Diego, CA 92111.
2. First Legacy Financial, Inc. (“First Legacy Financial”) was incorporated under the laws of California on May 13, 2003. Its principal place of business is also 4565 Ruffner Street, Suite 101, San Diego, CA 92111. It maintains a website at www.flfinc.com.
3. First Legacy Financial Group and First Legacy Financial also maintain a place of business at 3609 W. MacArthur Blvd. #810, Santa Ana, CA 92704.

1           4.       Richard H. Trefflich (“Trefflich”) is the co-founder and director of First Legacy  
2 Financial Group and First Legacy Financial.

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4           5.       David Crosby (“Crosby”) is the founder and CEO of First Legacy Financial Group and  
5 First Legacy Financial.

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7           6.       First Legacy Financial’s website features a presentation called “How Money Works.”  
8 In that presentation, First Legacy Financial states that it provides clients with a “worthy asset” that  
9 will “cash flow monthly,” and that the company does this by “buying distressed properties” and  
10 “transform[ing] them into desirable homes.”

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12           7.       Beginning in January 2008 or earlier, First Legacy Financial, First Legacy Financial  
13 Group, Crosby, and Trefflich offered and sold securities in the form of an investment contract to  
14 residents of California. The investment contract was memorialized by a document labeled  
15 “Agreement to Invest/Note.” The document states: “First Legacy Financial Group agrees to locate  
16 and negotiate the purchase of a [sic] various properties in Ogden UT. These properties will be  
17 purchased and sold and investor will receive interest.”

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19           8.       These securities were offered and sold in this state in issuer transactions. The  
20 Department of Corporations has not issued a permit or other form of qualification authorizing any  
21 person to offer or sell these securities in this state.

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23           Based upon the foregoing findings, the California Corporations Commissioner is of the opinion  
24 that the investment contracts that are being or have been offered or sold by First Legacy Financial  
25 Group, Inc.; First Legacy Financial, Inc.; David Crosby; and Richard Trefflich are securities subject to  
26 qualification under the California Corporate Securities Law of 1968 and are being or have been  
27 offered or sold without being qualified in violation of Corporations Code section 25110. Pursuant to  
28 section 25532 of the Corporate Securities Law of 1968, First Legacy Financial Group, Inc.; First

1 Legacy Financial, Inc.; David Crosby; and Richard Trefflich are hereby ordered to desist and refrain  
2 from the further offer or sale in the State of California of securities, including but not limited to  
3 investment contracts, unless and until qualification has been made under the law or unless exempt.  
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5 This Order is necessary, in the public interest, for the protection of investors and consistent  
6 with the purposes, policies, and provisions of the Corporate Securities Law of 1968.  
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8 Dated: August 5, 2010  
9 Los Angeles, California

PRESTON DuFAUCHARD  
California Corporations Commissioner

11 By: \_\_\_\_\_  
12 ALAN S. WEINGER  
13 Deputy Commissioner  
14 Enforcement Division  
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